



By Email and Electronic Portal

U.S. Environmental Protection Agency
Document Processing Desk (E-SUB)
Office of Pesticide Programs (7504P)
Room S4900, One Potomac Yard
2777 Crystal Drive Arlington, VA 22202

Mr. Reuben Baris
Product Manager, Team 25
Herbicide Branch

Subject: Response to deficiency associated with pending application for amendment of registration of M1768 Herbicide; EPA Reg. No. 524-617 (OPP Decision Number: 538753)

Dear Mr. Baris,

EPA notified Monsanto Company on February 6, 2019 that there was a deficiency in our pending application for the new use of M1768 Herbicide on dicamba-tolerant corn, EPA Reg. No. 524-617 (OPP Decision No. 538753). With this submission, Monsanto is providing a detailed discussion to resolve this issue and is submitting a waiver for field volatility data in lieu of the requested field volatility study for post-emergent use of XtendiMax on dicamba-tolerant corn.

The following documents were submitted to the EPA through the EPA's electronic portal:

- Cover Letter
- Copy of EPA Notification of Application Deficiency
- MRID 50833300: Transmittal Document
- MRID 50833301: Summary of Existing Field Volatility Studies for XtendiMax with VaporGrip Technology Applications in

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April 19, 2019

Simone Seifert-Higgins, Ph.D
Regulatory Affairs Manager

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Support of Data Waiver for Field Volatility Study on Dicamba-Tolerant Corn

If you have any questions regarding this submission, please contact James Nyangulu in our Washington D.C. office at (202) 383-2866, or by email at james.nyangulu@bayer.com, or me directly at (636) 737-9571, or by e-mail at simone.seifert-higgins@bayer.com.

Yours sincerely,

Bayer U.S. – Crop Science
Monsanto Company

A handwritten signature in cursive script, appearing to read "Simone Seifert-Higgins".

Simone Seifert-Higgins, Ph.D.
Regulatory Affairs Manager

Cc Emily Schmid